



Making Connections That Make a Difference

800 Westchester Ave.
Suite N-501
Rye Brook, NY 10573
914-922-7000
800-276-2384

June 1, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 17-133
Application of Broadview Networks, Inc. for Authority
Under Section 214(a) of the Communications Act and
Section 63.71 of the Commission's Rules

Dear Secretary Dortch:

On May 11, 2017, Broadview Networks, Inc. ("Broadview"), submitted an application for authority under Section 214(a) of the Communications Act, as amended (the "Act"), 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, to discontinue the provision of Broadview Long Distance Video Conferencing Service to five commercial customers (one in each of the States of Massachusetts, New Jersey, and New York and two in the Commonwealth of Pennsylvania). As of this date, no Public Notice concerning Broadview's application has been issued.

Today, Broadview has sent a supplemental notice to all affected customers providing certain additional details concerning the proposed discontinuance. A redacted version of Broadview's supplemental notice to customers is attached hereto as "Exhibit A".

Copies of this letter filing have today also been sent to the Offices of the Governors and the Public Utility Commissions of the States of Massachusetts, New Jersey, New York and Pennsylvania and to the Special Assistant for Telecommunications of the Secretary of Defense.

MARLENE H. DORTCH, SECRETARY
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To the extent you have any questions concerning this submission, kindly contact the undersigned.

Respectfully submitted,

A handwritten signature in cursive script that reads "Catherine M. Hannan". The ink is black and the signature is fluid and legible.

Catherine M. Hannan
Deputy General Counsel
Broadview Networks, Inc.
800 Westchester Avenue, Suite N-501
Rye Brook, NY 10573

EXHIBIT A



Making Connections That Make a Difference

800 Westchester Ave.
Suite N-501
Rye Brook, NY 10573
914-922-7000
800-276-2384

June 1, 2017

[Customer Name]
[Service Address]
[Service Address]

Re: Discontinuance of Broadview Long Distance Video Conferencing Service

Dear [Customer Name]:

Broadview Networks has been informed by one of our underlying carriers that it will be discontinuing service of the product which enables Broadview to provide Broadview Long Distance Video Conferencing (the "Service"). As a result, Broadview plans to discontinue Broadview Long Distance Video Conferencing service to you and four other commercial customers located in the States of Massachusetts, New Jersey, New York and Pennsylvania on June 30, 2017. As you are aware, Broadview Long Distance Video Conferencing service is a product which utilizes long distance capabilities to permit a room-wide video conferencing experience. In the period of time that Broadview Long Distance Video Conferencing service has been available, the telecommunications services market has advanced technologically in many ways and there are now certain similar products available from Broadview which would provide many of the same service functionalities as Broadview Long Distance Video Conferencing service.

Unfortunately, it is not possible to replicate Broadview Long Distance Video Conferencing exactly in the current telecommunications marketplace. For this reason, we have been in contact with you to provide you the opportunity to select another available product would should provide many of the functionalities of the Service and which would surpass, in certain respects, the capabilities of Broadview Long Distance Video Conferencing service for you. As of the date of this letter, you have not indicated whether you desire to transition to another available service product or simply to permit the scheduled discontinuance of Broadview Long Distance Video Conferencing service to proceed apace (i.e., whether you no longer require or desire a service arrangement with the functionalities previously provided by Broadview Long Distance Video Conferencing service). To aid you in making this decision, Broadview will be in contact with you again in the near future. Broadview appreciates your continued assistance and cooperation

as we work to accommodate the changes necessitated by the discontinuance of Broadview Long Distance Video Conferencing service as a result of the retirement of an essential input to the Service by Broadview's underlying carrier.

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that a customer would be unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Broadview Networks, Inc. Comments should include specific information about the impact of this discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

On, or after June 30, 2017, subject to approval from the FCC, your existing Broadview Long Distance Video Conferencing service will be discontinued. **If you wish to allow the discontinuation of Broadview Video Conferencing service to proceed as scheduled without selecting a replacement product, no action is required on your part.**

If you wish to migrate to a similar service, one which will mirror in many ways the benefits currently provided you by Broadview Long Distance Video Conferencing service, Broadview may require access to your premises to install the new service and/or equipment necessary to your migration to that new service. This may result in a short service interruption while your new service configuration is being installed. **Other than the unavailability of Broadview Long Distance Video Conferencing service after June 30, 2017, you will experience no changes to your Broadview services, which will continue to be provided to you in exactly the same manner as they are today.**

A Broadview representative will contact you within the next few days to discuss your choice of whether to replace Broadview Long Distance Video Conferencing service with a Broadview service which provides a similar functionality and, if necessary, to coordinate a date to migrate your company to that new service.

You may also contact our Customer Care line directly at **1-800-BROADVIEW** at any time to speak with a Customer Care representative should you have any questions or concerns.

We appreciate your assistance and patience through this transition and look forward to providing you with the best solution possible for your business.

Sincerely,

Broadview Networks

CERTIFICATE OF SERVICE

I, Catherine M. Hannan, certify that I have, on this 1st day of June, 2017, served copies of the foregoing Letter Amendment to Section 63.71 Application of Broadview Networks, Inc., by U.S. Mail, postage prepaid, to the following:

Hon. Sara J. Clark, Secretary
Massachusetts Department of Telecommunications
And Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

The Honorable Charlie Baker, Governor of Massachusetts
Office of the Governor
Room 280
Boston, MA 02113

Hon. Irene Kim Asbury, Secretary
New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

The Honorable Chris Christie, Governor of New Jersey
Office of the Governor
P. O. Box 001
Trenton, NJ 08625

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo, Governor of New York State
Office of the Governor
NYS State Capitol Building
Albany, NY 12224

Hon. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Keystone Building
Harrisburg, PA 17120

The Honorable Tom Wolf, Governor of Pennsylvania
Office of the Governor
225 Main Capitol
Harrisburg, PA 17120

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, D.C. 20301


CATHERINE M. HANNAN